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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

HON.

Plaintiff,

Civil Action No.

v.

Complaint

VICTOR H. NELSON
628 CHESTNUT STREET
ROSELLE, NJ 07203

Defendant(s).

The United States of America, plaintiff, alleges that:

JURISDICTION

1. This Court has jurisdiction over the subject matter of this action pursuant to Article III, Section 2, U.S. Constitution, 28 U.S.C. § 1345, and 28 U.S.C. § 3004.

STATEMENT OF THE CLAIM

2. The Defendant(s) is indebted to the United States for the following amounts:

Current principal balance (*after application of all prior payments, credits, and offsets*): \$4,729.14; plus current Capitalized Interest Balance and Accrued Interest: \$3,871.10; plus Administrative Fee, Costs, Penalties: \$0.00; making the total owed

(exclusive of pre-judgment interest, attorney's fees and costs) \$8,600.24 plus costs and post-judgment interest.

AND Current principal balance (after application of all prior payments, credits, and offsets): \$6,756.46; plus current Capitalized Interest Balance and Accrued Interest \$5,849.82; plus Administrative Fees, Costs and Penalties: \$0.00; making the total owed (exclusive of pre-judgment interest, attorney's fees and costs) \$12,615.28 plus costs and post-judgment interest.

3. The Certificate of Indebtedness, attached as Exhibit "B", shows the total owed excluding attorney's fees and Court costs and related charges. The principal balance and the interest balance shown on the Certificate of Indebtedness is correct as of the date of the Certificate of Indebtedness after application of all prior payments, credits, and offsets. Prejudgment interest accrues at the rate of 3.27% per annum from the date stated in Exhibit "B". The promissory notes which are at issue are attached as Exhibit "A" hereto.

AND The Certificate of Indebtedness, attached as Exhibit "D", shows the total owed excluding attorney's fees, Court costs and related charges. The principal balance and the interest balance shown on the Certificate of Indebtedness is correct as of the date of the Certificate of Indebtedness after application of all prior payments, credits and offsets. Prejudgment interest accrues at the rate of 3.39% per annum from the date stated in Exhibit "D". The promissory notes which are at issue are attached as Exhibit "C" hereto.

Failure to Pay

4. Demand has been made upon the defendant for payment of the indebtedness, and the defendant has neglected and refused to pay the same.

WHEREFORE, the United States of America prays for judgment:

A. For the sums set forth in paragraph 2 above, plus prejudgment interest through the date of judgment, all administrative costs, and service of process costs allowed by law, and post-judgment interest pursuant to 28 U.S.C. § 1961 with that interest on the judgment at the legal rate per annum until paid in full;

B. For attorneys' fees allowed by law or contract; and

C. For such other relief which the Court deems proper.

Respectfully submitted,

/s/ Frank J. Martone
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ATTORNEY FOR THE UNITED STATES OF AMERICA

NOTICE: IF THIS LINE _____ IS CHECKED, THE NOTES ARE TRUE COPIES

CDCS Number: 2011A11366 & 2011A11373

**NOTICE REQUIRED BY THE FAIR DEBT COLLECTION PRACTICES ACT 15 U.S.C. SECTION
1601 AS AMENDED**

1. The amount of the debt is stated in paragraph two of the complaint attached hereto.
2. The plaintiff who is named in the attached summons and complaint is the creditor to whom the debt is owed.
3. The debt described in the complaint attached hereto will be assumed to be valid by the creditor's law firm, unless the debtors, within thirty days after receipt of this notice, disputes, in writing, the validity of the debt or some portion thereof.
4. If the debtor notifies the creditor's law firm in writing within thirty days of the receipt of this notice that the debt or any portion thereof is disputed, the creditor's law firm will obtain verification of the debt and a copy of the verification will be mailed to the debtor by the creditor's law firm.
5. If the creditor who is named as plaintiff in the attached summons and complaint is not the original creditor, and if the debtor makes written request to the creditor's law firm within thirty days from the receipt of this notice, the name and address of the original creditor will be mailed to the debtor by the creditor's law firm.
6. Written request should be addressed to Fair Debt Collection Clerk, Law Office of Frank J. Martone, P.C., 1455 Broad Street, Bloomfield, NJ 07003.

**THIS IS AN ATTEMPT TO COLLECT A DEBT.
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**